

IN THE UNITED STATES DISTRICT COURT FOR THE
WESTERN DISTRICT OF OKLAHOMA

UNITED STATES OF AMERICA,)	
)	
Plaintiff,)	
)	
-vs-)	No. CR-18-029-SLP
)	
NAIF ABDULAZIZ M. ALFALLAJ,)	
a/k/a Al-Muthana Al-Najdi,)	
)	
Defendant.)	

JOINT MOTION TO EXTEND DEADLINE
TO FILE SENTENCING MEMORANDUM

COMES NOW, Plaintiff, by Timothy J. Downing, United States Attorney for the Western District of Oklahoma, through Matt Dillon, Assistant United States Attorney, and Naif Abdulaziz M. Alfallaj, through his attorneys of record, Michael A. Abel, William H. Campbell, and Kenny R. Goza, and moves this Court, for an extension of time in which to file sentencing memorandums. In support of this motion, the parties submit the following:

1. On February 6, 2018, the Federal Grand Jury returned an Indictment charging three counts in relation to Visa fraud and giving false statements involving international terrorism to the Federal Bureau of Investigation and the Department of Homeland Security.

2. On December 14, 2018, Defendant entered a plea of guilty to Count 1 of the Indictment, Visa fraud; and Count 3, charging false statements involving international terrorism.

3. The final presentence report in this case was filed on June 18, 2019. [Doc. 78].

4. No previous continuances have been requested to extend the deadline to file sentencing memoranda.

5. Sentencing in this case has not yet been set.

6. The current deadline to submit sentencing memoranda is July 2, 2019. The parties seek a 5-week extension for the following reasons:

- a. Additional time is needed to further research the issues presented in the final presentence report;
- b. Lead counsel for the United States, Matt Dillon, will be out of the office July 3-7, 2019; and
- c. Michael Abel, counsel for Defendant, will be out-of-state between July 24-August 5, 2019.

7. The parties are not aware of any prejudice to either party as a result of this extension of time.

8. Defendant joins in this motion for the requested continuance.

PREMISES CONSIDERED, the parties therefore request an extension of the deadline to file sentencing memoranda no sooner than August 6, 2019.

Respectfully submitted,

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CERTIFICATE OF SERVICE

I hereby certify that on June 28, 2019, I electronically transmitted the attached document to the Clerk of Court using the ECF System for filing and transmittal of a Notice of Electronic Filing, which will automatically send e-mail notification of such filing to: Michael A. Abel, Kenny R. Goza, and William H. Campbell.

s/ Matt Dillon

Assistant U.S. Attorney